

**Wausau- Mosinee Paper Corporation,
Specialty Paper Group, Otis Mill
Franklin County
Jay, Maine
A-149-70-A-I**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License**

After review of the Initial Part 70 License application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. Registration

A. Introduction

FACILITY	Wausau-Mosinee Paper Corporation, Specialty Paper Group, Otis Mill (Wausau)
LICENSE NUMBER	A-149-70-A-I
LICENSE TYPE	Initial Part 70 License
SIC CODES	2621
NATURE OF BUSINESS	Paper & Allied Products Manufacturer
FACILITY LOCATION	1 Mill Street, Jay
DATE OF LICENSE ISSUANCE	August 14, 2000
LICENSE EXPIRATION DATE	August 14, 2005

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Boiler #1	147 MMBtu/hr	Fuel Burning, #6 Oil & Specification Waste Oil
Boiler #2	73 MMBtu/hr	Fuel Burning, #6 Oil & Specification Waste Oil
Boiler #3	73 MMBtu/hr	Fuel Burning, #6 Oil & Specification Waste Oil
Boiler #4	73 MMBtu/hr	Fuel Burning, #6 Oil & Specification Waste Oil
Fire Protection Pump	1.25 MMBtu/hr	Fuel Burning, Diesel
#9 Paper Machine	240 tons coated paper/day	Process Equipment*
#11 Paper Machine	120 tons coated paper/day	Process Equipment*

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Off Machine Coater	62 tons coated paper/day	Process Equipment*
Solids Mixing Tanks (6)	Various	Process Equipment
Solvent Degreasers (7)	Tanks from 10 to 30 gal.	Miscellaneous Equipment

Note: * - Unit capacities for process equipment are listed for informational purposes only and are not intended as license restrictions.

Wausau has additional insignificant activities, which do not need to be listed in the emission equipment table above.

C. Application Classification

The application for Wausau does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be an Initial Part 70 License issued under Chapter 140 of the Department's regulations for a Part 70 source.

II. EMISSION UNIT DESCRIPTION

A. Boilers #1, 2, 3, & 4

Wausau is authorized to operate the following fuel burning equipment:

Equipment	Date of Construction	Max. Capacity (MMBtu/hr)	Fuel Type, % Sulfur	Maximum Firing Rate (gal/hr)	Stack #
Boiler #1	1948	147	#6 & Spec Waste Oil, 2.0%	980	1
Boiler #2	1927	73	#6 & Spec Waste Oil, 2.0%	487	1
Boiler #3	1927	73	#6 & Spec Waste Oil, 2.0%	487	1
Boiler #4	1927	73	#6 & Spec Waste Oil, 2.0%	487	1

Boiler #1 was manufactured by Combustion Engineering to fire oil and coal with a maximum heat input of 147 MMBtu/hr. The boiler was installed in 1948, prior to the New Source Performance Standards (NSPS) Subpart Db applicability date. Boiler #1 operates to provide process steam, electrical generation, and the heating needs of the plant.

Boilers #2, 3, & 4 are three identical boilers manufactured by Ladd to fire oil and coal with a maximum heat input of 73 MMBtu/hr. All three boilers were installed in 1927, prior to the NSPS Subpart Dc applicability date. Boilers #2, 3, & 4 operate to provide process steam, electrical generation, and the heating needs of the plant.

Boilers #1, 2, 3, & 4 were retrofitted with low NO_x burners in 1995. Emissions from all four boilers exit through a common 197 ft. stack. The breaching to the common stack has a continuous opacity monitor (COM). A reducing nozzle has been installed on the stack to decrease the diameter from 12 ft. to 6 ft. 10 in. which increases the exiting gas velocity and minimizes any negative plume rise attributable to stack tip downwash.

Streamlining

Opacity

Wausau accepts streamlining for opacity requirements. Chapter 101, Section 2(A)(1) of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The Best Practical Treatment (BPT) opacity limit is more stringent. Therefore, only the more stringent BPT opacity limit is included in this license. The BPT opacity limit allows for operational flexibility, which is incorporated to allow for periods of start up/shut down operations when more than one boiler is on-line.

Particulate Matter

Wausau accepts streamlining for particulate matter requirements. Chapter 103 of the Department's regulations and BPT requirements are applicable. The Best Practical Treatment (BPT) particulate matter limit is more stringent. Therefore, only the more stringent BPT particulate matter limit is included in this license.

Periodic Monitoring

Periodic monitoring shall consist of maintaining fuel use records, fuel analysis records, periodic compliance testing on each boiler exhaust for particulate matter and NO_x, and continuous monitoring for opacity. Boilers #1, 2, 3, & 4 all vent through Stack #1 and therefore share one opacity monitor. Periodic monitoring also includes the instrument monitoring and record keeping requirements in Chapter 117.

B. Fire Protection Pump

The Fire Protection Pump has a design capacity of 1.25 MMBtu/hr.

In order to comply with NO_x RACT requirements, Wausau accepted a license restriction of 500 hr/yr for the Fire Protection Pump to maintain NO_x emissions under 10 tons per year.

Streamlining

Opacity

Wausau accepts streamlining for opacity requirements. Chapter 101, Section 2(A)(1) of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The Best Practical Treatment (BPT) opacity limit is more stringent. Therefore, only the more stringent BPT opacity limit is included in this license.

Sulfur Dioxide

Wausau accepts streamlining for sulfur dioxide requirements. Chapter 106 and BPT limits are applicable. The BPT sulfur dioxide limit is more stringent. Therefore, only BPT requirements are included in this license.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping which includes fuel analysis records and hours of operation.

Based on best management practices and the type of fuel for which the pump was designed, it is unlikely that the Fire Protection Pump will exceed the opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

C. Paper Machines and Coaters

Wausau is licensed to operate the following paper machines and coaters:

#9 Paper Machine
#11 Paper Machine
Off Machine Coater

Wausau has an off machine coater and coaters on the paper machines themselves that utilize primarily aqueous base coatings with extremely small quantities of VOC in solution. Wausau considers the potential of any VOC emissions to be less than 1% of all total airborne emissions from the off machine coater and it is therefore considered by the Department to be a negligible source of VOC emissions.

Wausau also uses an ammonia hydroxide solution to maintain a pH balance, thus small amounts of ammonia are released under heated conditions. Wausau and the Department consider these emissions to be minimal and are noted for inventory purposes only.

Periodic Monitoring

There are no applicable requirements associated with chemical use for the paper machines. There are no applicable requirements that would affect the use of the chemicals used on these processes therefore no periodic monitoring is required. However, the Department is not precluded from requesting testing for VOCs.

The coaters are subject to Chapter 123, which regulates VOC emissions from paper coaters. Periodic monitoring for the coaters includes maintaining records of amount of coating use and VOC content of solutions.

D. Mixing Tanks

Wausau operates the following equipment:

Equipment	Control
#1 Starch Mixing Tank	Baghouse #1
#2 Starch Mixing Tank	Baghouse #2
#1 Blender	Baghouse #3
Abbe Mixer	Baghouse #3
Kady Mill	Baghouse #4
Reid Mixer	Baghouse #4

Streamlining

Opacity

Wausau accepts streamlining for opacity requirements. Chapter 101, Section 2(C) of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The Best Practical Treatment (BPT) opacity limit is more stringent. Therefore, only the more stringent BPT opacity limit is included in this license.

E. Solvent Degreasers

Wausau operates seven Safety Klean Solvent Degreasers.

Periodic Monitoring

Periodic monitoring for the degreaser units shall consist of recordkeeping including records of solvent added and removed.

F. Facility Emissions

Total Allowable Annual Emissions for the Facility (used to calculate the license fee)

Pollutant	Tons/Year
PM	131.4
PM ₁₀	122.6
SO ₂	1830.8
NO _x	351.8
CO	26.6
VOC	44.0

III. AIR QUALITY ANALYSIS

Wausau previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this Initial Part 70 License.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-149-70-A-I, subject to the following conditions:

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only.**

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emission units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples,

- conducting inspections, or examining and copying records relating to emissions and this license;
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140;
 - (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both;
 - (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request; **Enforceable by State-only**
 - (5) The licensee shall pay the annual air emissions license fee to the Department, calculated pursuant to Title 38 MRSA § 353;
 - (6) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege;
 - (7) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions; **Enforceable by State-only**
 - (8) The licensee shall maintain sufficient records, to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license;
 - (9) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license.

- (10) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.
- (11) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license;
- (12) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
 - (a) perform stack testing under circumstances representative of the facility's normal process and operating conditions:
 - (i) within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;
 - (ii) to demonstrate compliance with the applicable emission standards; or
 - (iii) pursuant to any other requirement of this license to perform stack testing.
 - (b) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emissions testing; and
 - (c) submit a written report to the Department within thirty (30) days from the date of test completion.

Enforceable by State-only

- (13) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:
 - (a) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

- (b) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there where intervening days during which no violation occurred or that the violation was not continuing in nature; and
- (c) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on a interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

Enforceable by State-only

- (14) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.
- (15) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
 - (a) Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
 - (b) The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to section 114 of the CAA.

- (16) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring

- sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license.
- (17) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next working day, whichever is later, of such occasions and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;
- (18) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.
- (19) The licensee shall submit quarterly reports of any required monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official.
- (20) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequent if specified in the Applicable requirement by the Department. The compliance certification shall include the following:
- (a) The identification of each term or condition of the Part 70 license that is the basis of the certification;
 - (b) The compliance status;
 - (c) Whether compliance was continuous or intermittent;
 - (d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - (e) Such other facts as the Department may require to determine the compliance status of the source;

- (21) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:
- (a) Additional Applicable requirements under the CAA become applicable to the Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;
 - (b) Additional requirements (including excess emissions requirements) become applicable to the Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;
 - (c) The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms of conditions of the Part 70 license; or
 - (d) The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

- (22) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license.

SPECIAL CONDITIONS

(23) Permit Shield for Non-Applicable Requirements

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application October 25, 1996.

	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
A	Facility	Chapter 107	Sulfur Dioxide Emission Standards for Sulfite Pulp Mills	Facility is not a Sulfite Pulp Mill.
B	Facility	Chapter 111	Petroleum Liquid Vapor Storage Control	No applicable sources at this facility
C	Facility	Chapter 124	Total Reduced Sulfur Control from Kraft Pulp Mills	Facility is not a Kraft Mill
D	Off Machine Coater	Chapter 126	Capture Efficiency Test Procedures	Facility does not use add on VOC control equipment
E	Off Machine Coater	Chapter 129	Surface Coating	Does not apply to paper coating
F	Facility	Chapter 132	Graphic Arts-Rotogravure and Flexography	No applicable sources at this facility
G	Boilers #1, 2, 3, & 4	Chapter 134	VOC RACT	Exempt per Section 1(C)(4)
H	#9 & #11 Paper Machines	Chapter 134	VOC RACT	Exempt per Section 1(C)(7)
I	Boilers #1, 2, 3, & 4	40 CFR Part 60, Subpart D, Da, Db, Dc	Steam Generating Units	All units constructed prior to 1971 and have not been modified or reconstructed as defined by 40 CFR Part 60, Subpart A
J	Off Machine Coater	40 CFR Part 60, Subpart RR	Pressure Sensitive Tape and Label Coating Operations	Coater is not used to make pressure sensitive tape or label materials

(24) **Boilers #1, 2, 3, & 4**

A. Wausau is licensed to operate Boilers #1 (147 MMBtu/hr) and Boilers #2, 3, & 4 (73 MMBtu/hr each) which are licensed to fire #6 fuel oil and specification waste oil. [MEDEP Chapter 140, BPT]

B. Specification Waste Oil

1. The waste oil to be burned shall meet the criteria for Specification Waste Oil.
2. A log shall be kept recording the quantity and type of waste oil burned in any of the four boilers.
3. The amount of Specification Waste Oil fired at Wausau shall not exceed 10,000 gallons/year (12-month rolling total basis).
[MEDEP Chapter 140, BPT]

C. The sulfur content of the fuel oil fired shall not exceed 2.0% by weight demonstrated by purchase records from the supplier. [MEDEP Chapter 106]

D. Emissions from Boilers #1 shall each not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.15	MEDEP Chapter 140, BPT	-
PM ₁₀	0.14	MEDEP Chapter 140, BPT	Enforceable by State-only
NO _x	0.35	MEDEP Chapter 140, BPT	Enforceable by State-only

E. Emissions from Boilers #2, 3, & 4 shall each not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.15	MEDEP Chapter 140, BPT	-
PM ₁₀	0.14	MEDEP Chapter 140, BPT	Enforceable by State-only

F. NO_x Limits for Boilers #2, 3, & 4

- a. NO_x emissions from Boilers #2, 3, & 4 shall each not exceed 0.40 lb/MMBtu when the boiler is running at, or greater than, 50% of its maximum load.
- b. NO_x emissions from Boilers #2, 3, & 4 shall each not exceed 29.2 lb/hr when the boiler is running at less than 50% of its maximum load.
[MEDEP Chapter 140, BPT] **Enforceable by State-only**

- G. The lb/MMBtu NO_x limit and particulate matter limits are demonstrated by compliance testing each boiler every two years. [MEDEP Chapter 140, BPT]
- H. Total stack emissions from Boilers #1, 2, 3, & 4 shall be limited to the following:

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	30.0	MEDEP Chapter 140, BPT	Enforceable by State-only
PM ₁₀	28.0	MEDEP Chapter 140, BPT	Enforceable by State-only
SO ₂	418.0	MEDEP Chapter 140, BPT	Enforceable by State-only
NO _x	90.0	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	6.0	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	2.0	MEDEP Chapter 140, BPT	Enforceable by State-only

- I. SO₂, VOC, and CO limits are based on a 1-hour block average basis and shall be demonstrated by compliance testing upon request by the Department. [MEDEP Chapter 140, BPT]
- J. The following firing rates shall not be exceeded:
- Boiler #1 147 MMBtu/hr
 - Boilers #2, 3, & 4 73 MMBtu/hr each
 - Any combination of firing shall not exceed 4,000 gal/3-hours on a rolling total basis as recorded by the combined fuel flow meter.
[MEDEP Chapter 140, BPT]
- K. Wausau shall maintain records of hourly fuel use indicating the type and quantity of fuel consumed (gallons). [MEDEP Chapter 140, BPT]
- L. Wausau shall operate Boilers #1, 2, 3, & 4 with low-NO_x burner technology. [MEDEP Chapter 138, NO_x RACT]
- M. Opacity
- When only one boiler is operating, Wausau shall operate the boiler such that the visible emissions from the stack does not exceed 30% opacity on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour block. (Three-hour blocks are defined as periods of three consecutive hours starting at midnight. Blocks do not overlap. A day consists of (8) three-hour blocks.)

2. Except as provided for in Condition (24)(M)(3), when more than one boiler is operating visible emissions from the combined stack shall not exceed 30% opacity on a six (6) minute block average basis except for no more than two (2) six (6) minute block averages in a 3-hour block.
3. When more than one boiler is operating, visible emissions may exceed 30% no more than 12 times per calendar year. During these times, stack opacity shall not exceed 40% opacity for more than 18 minutes, recorded as six (6) minute averages, in a 3-hour period.
4. Wausau shall maintain a continuous opacity monitor (COM) on the breaching of Stack #1 in accordance with Chapter 117. The COM shall meet the monitoring requirements of 40 CFR Part 60.13 as well as 40 CFR Part 60, Appendices B and F.
[MEDEP Chapter 140, BPT]

(25) **Fire Protection Pump**

- A. Wausau is licensed to operate a Fire Protection Pump (1.25 MMBtu/hr) which is licensed to fire diesel fuel. [MEDEP Chapter 140, BPT]
- B. The sulfur content of the fuel oil fired shall not exceed 0.05% by weight demonstrated by purchase records from the supplier. [MEDEP Chapter 140, BPT]
- C. Emissions from the Fire Protection Pump shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.12	MEDEP, Chapter 103, Section 2(B)(1)(a)	-

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	0.15	MEDEP Chapter 140, BPT	Enforceable by State-only
PM ₁₀	0.15	MEDEP Chapter 140, BPT	Enforceable by State-only
SO ₂	0.06	MEDEP Chapter 140, BPT	Enforceable by State-only
NO _x	5.51	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	1.19	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	0.44	MEDEP Chapter 140, BPT	Enforceable by State-only

- D. Wausau shall operate the Fire Protection Pump such that the visible emissions from the stack does not exceed 30% opacity on a six (6) minute block average

basis, for more than two (2) six (6) minute block averages in a 3-hour block.
[MEDEP Chapter 140, BPT]

- E. Wausau shall maintain records of annual diesel fuel use indicating the quantity of fuel consumed (gallons) and the percent (%) sulfur content of the fuel by weight demonstrated by purchase records from the supplier. [MEDEP Chapter 140, BPT]
- F. Wausau shall not exceed an annual usage of the Fire Protection Pump of 500 hr/year (12 month rolling total). The Fire Protection Pump shall be equipped with an hour meter and a written log shall be maintained of all the operating hours to demonstrate compliance with the 500 hr/year operational limit. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

(26) **Paper Machines and Off Machine Coater**

- A. Wausau is licensed to operate the following equipment [MEDEP Chapter 140]:

Equipment
#9 Paper Machine
#11 Paper Machine
Off Machine Coater

- B. The paper machines and the Off Machine Coater are subject to the requirements of MEDEP Chapter 123.
1. Wausau shall not use coating solutions containing in excess of 2.9 pounds of VOC per gallon of coating.
 2. Wausau shall maintain records of amount of coating use and VOC content of solutions in accordance with MEDEP Chapter 123 Section (D).
[MEDEP Chapter 123, Paper Coating]

(27) **Mixing Tanks**

A. Wausau is licensed to operate the following equipment:

Equipment	Control
#1 Starch Mixing Tank	Baghouse #1
#2 Starch Mixing Tank	Baghouse #2
#1 Blender	Baghouse #3
Abbe Mixer	Baghouse #3
Kady Mill	Baghouse #4
Reid Mixer	Baghouse #4

B. Opacity from the baghouses shall not exceed 10% opacity based on a six minute block average. [MEDEP Chapter 140, BPT]

(28) **Safety Klean Degreasers**

Wausau shall label the parts washers with operational standards, equip the washers with covers if the solvent's vapor pressure is >15 mmHG at 100°F, close covers when not in use, drain parts for 15 seconds or longer, shall not degrease porous material, keep drafts < 40 m/minute, repair leaks, and keep records of solvent added and removed. [MEDEP Chapter 130]

(29) **Facility Wide VOC Limit**

Wausau shall not exceed a facility wide VOC emission limit of 44.0 ton/year. [MEDEP Chapter 140]

(30) **Recordkeeping**

For all recordkeeping required by this license, the licensee shall maintain records of the most current six year period. [MEDEP Chapter 140]

A. Wausau shall maintain hourly and monthly fuel use records indicating the type and quantity of fuel consumed (gallons), the percent (%) sulfur content of the fuel by weight, and the heat content of the fuel demonstrated by purchase receipts from the supplier and fuel use records. [MEDEP Chapter 140, BPT]

[MEDEP Chapter 140, BPT]

(31) **Continuous Opacity Monitor (COM) and Parameter Monitor**

A COM is required on the breaching of Stack #1. A fuel flow meter is required on the common fuel line. The COMS and fuel flow monitors required by this license shall be the primary means of demonstrating compliance with emission

standards set by this Order, statute, state or federal regulation, as applicable. The licensee shall comply with the following: [MEDEP Chapter 140, BPT]

A. Performance Specifications

The fuel flow monitor must record accurate and reliable data. If the fuel flow meter is recording accurate and reliable data less than 98% of the source operating time within any quarter of the calendar year, the Department may initiate enforcement action and may include in that enforcement action any period of time that the fuel flow monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction of the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions.

All COMS shall meet the sampling and performance criteria specified in 40 CFR Part 51 Appendix P, and shall be operated in accordance with 40 CFR Part 60 Appendix F and Chapter 117 of the Department's regulations.

1. Conduct Performance Audits in accordance with Chapter 117 of the Department's regulations.
2. Develop and maintain an updated quality assurance plan for all COMS in accordance with 40 CFR Part 60 Appendix F and Chapter 117 of the Department's regulations.

[MEDEP Chapter 117]

B. Recordkeeping

For all of the continuous opacity monitors (COMS), fuel flow monitoring and recording, required by this license, the licensee shall maintain records of the most current six year period and the records shall include:

1. Documentation which shows monitor operational status during all source operating time, including specifics for calibration and audits; and [MEDEP Chapter 117]
2. A complete data set for the fuel flow monitor as specified in this license. All records shall be made available to the Bureau of Air Quality upon request.
[MEDEP Chapter 117]
3. For all COMS the records shall include:
 - a. Documentation that all COMS are continuously accurate, reliable and operated in accordance with Chapter 117, 40 CFR Part 51, Appendix P, and 40 CFR Part 60, Appendices B and F; [MEDEP Chapter 117]

- b. Records of all measurements, performance evaluations, calibration checks, and maintenance or adjustments for each COMS as required by 40 CFR Part 51 Appendix P; [MEDEP Chapter 117]

C. Quarterly Reporting

The licensee shall submit a Quarterly Report to the Bureau of Air Quality within 30 days after the end of each calendar quarter, detailing the following, for the control equipment, parameter monitors, and Continuous Opacity Monitoring Systems (COMS) required by this license. [MEDEP Chapter 117]

1. All control equipment downtimes and malfunctions;
2. All COMS downtimes and malfunctions;
3. All fuel flow monitor downtimes and malfunctions;
4. All excess events of emission and operational limitations set by this Order, Statute, state or federal regulations, as appropriate. The following information shall be reported for each excess event;
 - a. Standard exceeded;
 - b. Date, time, and duration of excess event;
 - c. Maximum and average values of the excess event, reported in the units of the applicable standard, and copies of pertinent strip charts and printouts when requested;
 - d. A description of what caused the excess event;
 - e. The strategy employed to minimize the excess event; and
 - f. The strategy employed to prevent reoccurrence.
5. A report certifying there were no excess emissions, if that is the case.

(32) Semiannual Reporting

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due with every other quarterly report, and the initial semiannual report is due January 30, 2001 with the second quarterly report submitted following the date of signature of this license.

- A. Each semiannual report shall include a summary of the periodic monitoring required by this license.
- B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.
[MEDEP Chapter 140]

(33) Annual Compliance Certification

The licensee shall submit an annual compliance certification to the Department in accordance with Condition (20) of this license. The initial annual compliance certification is due October 30, 2001 with the submittal of the second semiannual report after the signature date of this license. [MEDEP Chapter 140]

(34) **Annual Emission Statement**

The licensee shall annually report to the Department and EPA, in a specified format, fuel use, operating rates, use of materials and other information necessary to accurately update the State's emission inventory. [MEDEP Chapter 137]

(35) The licensee is subject to the State regulations listed below.

<u>Origin and Authority</u>	<u>Requirement Summary</u>
Chapter 102	Open Burning
Chapter 109	Emergency Episode Regulation
Chapter 110	Ambient Air Quality Standard
Chapter 116	Prohibited Dispersion Techniques

(36) **Certification by a Responsible Official**

All documents and reports (including quarterly reports, semiannual reports, and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official. [MEDEP Chapter 140]

(37) The term of this license shall be five (5) years from the signature date below.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2000.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: October 28, 1996

Date of application acceptance: October 28, 1996

Date filed with the Board of Environmental Protection _____

This Order prepared by Lynn Ross, Bureau of Air Quality.